

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA)
) DOCKET NO. 19-CR-251-LM
V.)
)
JOHNATHON IRISH)
)

**REQUEST FOR MISSING WITNESS JURY INSTRUCTION (REFILED
WITH CORRECT EXHIBIT)**

Defendant Johnathon Irish respectfully requests that the Court give the model missing witness instruction attached hereto. Given the Agent Tongbua's testimony that he was in close contact (on at least twelve occasions) with Stephanie Irish and that Ms. Irish provided material assistance to the Government, and the fact that she is involved in divorce proceedings against the defendant, Irish submits that the instruction is appropriate in this case.

Defendant
Johnathon Irish
By his Attorney,

/s/ Benjamin L. Falkner
Benjamin L. Falkner (NH Bar No. 17686)
KRASNOO, KLEHM & FALKNER LLP
28 Andover Street, Suite 240
Andover, MA 01810
(978) 475-9955 (telephone)
(978) 474-9005 (facsimile)
bfalkner@kkf-attorneys.com

Dated: February 11, 2020

CERTIFICATE OF SERVICE

I hereby certify that I served a true copy of the within document upon the attorney of record for the Government via the Court's ecf system on February 11, 2020.

/s/ Benjamin L. Falkner
Benjamin L. Falkner